

STATE OF INDIANA        )  
                          ) SS: IN THE HENDRICKS SUPERIOR COURT I  
COUNTY OF HENDRICKS ) 1994 TERM  
                          ) CASE NO. 32D01-9011-ES-133

IN THE MATTER OF THE ESTATE OF        )  
  )  
PHILIP LEE PLOUGHE, Deceased.        )

TOWN OF BROWNSBURG'S REPSONSE TO PERSONAL REPRESENTATIVE'S  
VERIFIED PETITION TO QUIET TITLE TO AND FOR AUTHORITY TO  
SELL REAL ESTATE

Comes now the Town of Brownsburg, by its undersigned counsel, and having been served with the Personal Representative's Verified Petition to Quiet Title To and For Authority to Sell Real Estate and the Order of this Court entered thereon requiring all interested parties to assert their respective claims with respect to such real estate, alleges and says:

1. That it is the holder of a claim previously filed against the decedent's estate in the amount of \$325.59 dated July 3, 1992.
2. That no additional charges have accrued against the decedent's estate since July 6, 1992.
3. That said claim has accrued interest at the legal rate since July 6, 1992.
4. That in support of its claim, the Town reasserts and refiles its Claim herein in the sum of \$325.59 which is incorporated by reference and is identified as Exhibit "A" attached hereto.
5. That the claim of the Town of Brownsburg is valid and still in full force and effect.

WHEREFORE, the Town of Brownsburg, by counsel, requests that the Court file the above and foregoing pleading of record in this estate, that the content of the same be noted by the Court, that the claim of the Town of Brownsburg be paid in full and for all other proper relief.

LEWIS & BLAKE

By:



Seth B. Lewis, #8820-32  
Attorney for the Town of  
Brownsburg

LEWIS & BLAKE  
97 W. Marion Street  
Danville, IN 46122  
(317) 745-2883

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following by United States first-class mail, postage prepaid, on the 18<sup>th</sup> day of February, 1994:

Kurt F. Pantzer, III  
FOLEY & POOL  
342 Massachusetts Avenue, #301  
Indianapolis, IN 46204

The First National Bank and Trust Co.  
101 W. Main Street  
Plainfield, IN 46168

Bonnie Jo Cooksey  
5551 N. Raceway Road  
Indianapolis, IN 46234

Bank One, Plainfield, N.A.  
c/o Gregory W. Blake  
106 N. Washington Street  
Danville, IN 46122

Pamela R. Baker-Ploughe  
613 W. Main Street  
Plainfield, IN 46168

Rimothy R. Johnson  
Indianapolis Department of Environmental Management  
Indiana Government Center South, 13th Floor  
P. O. Box 6015  
Indianapolis, IN 46206-6015

George and Bobbie Miller  
c/o J. C. Buehler  
8250 Haverstock Road, #295  
Indianapolis, IN 46240-2402

P. Todd Ploughe  
c/o Sandra K. Ploughe  
1075 E. Main Street  
Brownsburg, IN 46112

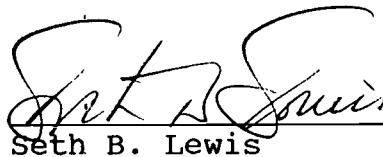
Hendricks County Treasurer  
Courthouse  
Danville, IN 46122

Cynthia J. Kinney  
72 N. Bellview Place  
Indianapolis, IN 46222

Matthews Mortuary  
c/o Ken A. Elmendorf  
17 N. Grant Street  
Brownsburg, IN 46112

Debra S. Harper  
Internal Revenue Service  
2601 Fortune Circle East, Suite 301A  
Indianapolis, IN 46241

David E. Kenninger  
35 W. Marion Street  
Danville, IN 46122



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Seth B. Lewis

**TO** c/o Jeanette M. Brickler, Clerk-Treasurer **DR.**  
~~80 E. Vermont Street~~  
Brownsburg, IN 46112

**FILED**

JUL 6 1992

Cornie J. Hendricks  
CLERK HENDRICKS CIRCUIT  
SUPERIOR COURT

**EXHIBIT**

A

# WATER AND SEWER CONSUMER'S LEDGER

ACCT. NUMBER	SERVICE CODE	PEN. CODE	MINIMUM	TAX CODE	LAST READING WATER	READING DATE
	WATER	SEWER	WATER	SEWER		

PHIL PLOUGHE  
39 N GRANT ST  
BROWNSBURG IN 46112

180.01 1 1 0 7.34 4.55 0 454,750 5 21

39 N GRANT

DATE	PRESENT READING	CONSUMPTION	WATER	TAX	WATER PENALTY	CASH	TOTAL	SEWAGE	SEWAGE PENALTY	CASH	TOTAL	TOTAL DUE
MAY 1 85			.00	.00			189.06*	.00			189.06*	340.59*
JUNE 1 85			.00	.00	1.19		189.06*	.00			189.06*	340.59*
JUL 1 85	444310	9,560	33.00	1.00			189.06*	26.00			215.06*	366.59*
AUG 1 85			.00	.00	1.22		189.06*	.00			189.06*	340.59*
SEP 1 85	473130	8,820	31.00	1.00			189.06*	26.00			215.06*	366.59*
OCT 1 85			.00	.00	1.15		189.06*	.00			189.06*	340.59*
NOV 1 85	481170	8,040	28.52	1.43			137.00*	24.95			161.95*	306.81*
DEC 1 85			.00	.00	1.07		138.07*	.00			138.07*	247.65*
JAN 1 86	489900	8,730	30.89	1.54			170.50*	26.73			197.23*	323.98*
FEB 1 86			.00	.00	1.14		171.64*	.00			171.64*	307.95*
MAR 1 86	492330	2,430	8.80	.44			180.88*	10.67			191.55*	328.86*
APR 1 86			.00	.00	.47		181.35*	.00			181.35*	328.33*
MAY 1 86	492330		7.34	.37			189.06*	4.55			193.61*	345.59*
JUNE 1 86			.00	.00			189.06*	.00			189.06*	340.59*
JUL 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
AUG 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
SEP 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
OCT 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
NOV 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
DEC 1 86			.00	.00	.00		189.06*	.00			189.06*	340.59*
JAN 1 87			.00	.00	.00		189.06*	.00			189.06*	340.59*
FEB 1 87			.00	.00	.00		189.06*	.00			189.06*	340.59*
MAR 1 87			.00	.00	.00		189.06*	.00			189.06*	340.59*
APR 1 87			.00	.00	.00		189.06*	.00			189.06*	340.59*
4-18-90							174.00				151.53	325.59

*Signature*

157

174.00

151.53 325.59

APPROVED BY STATE BOARD OF ACCOUNTS  
FOR TOWN OF BROWNSBURG - 1977

MAGNETIC UNIT RECORD

## SERVICE CODE

1. COMMERCIAL
2. INDUSTRIAL
3. MUNICIPAL

## PENALTY CODE

0. COMPUTE PENALTY
1. NO PENALTY

## TAX CODE

0. COMPUTE TAX
1. NO TAX

TOWN OF BROWNSBURG  
WATER & SEWAGE  
BROWNSBURG, INDIANA 46112

Burroughs 2-77

EXHIBIT A